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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THE DECLARATION OF
ARTURO J. GONZÁLEZ IN RESPONSE
TO DECLARATION OF JEFF
NARDINELLI AND EXHIBITS
THERE TO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal the Declaration of Arturo J. Gonzalez in
8 Response to Declaration of Jeff Nardinelli and Exhibits Thereto (“Administrative Motion”). The
9 Administrative Motion seeks an order sealing highlighted portions of the Declaration of Arturo J.
10 Gonzalez in Response to Declaration of Jeff Nardinelli (“Gonzalez Declaration”) and of Exhibits 4
11 and 8 thereto, as well as the entirety of Exhibits 3 and 5 thereto.

12 3. The Gonzalez Declaration (green highlighted portion at page 15, line 12) contains
13 highly sensitive information that Waymo seeks to seal. Specifically, that portion contains a domain
14 that hosts Waymo’s computer systems. Public disclosure of such information will give bad actors
15 seeking to hack Waymo’s databases a target to attack. Further, there is no public purpose served by
16 disclosing the precise web or IP address at which a server resides.

17 4. Exhibit 8 (green highlighted portions) contains, references, and/or describes highly
18 confidential and sensitive business information. The information Waymo seeks to seal regards
19 confidential details regarding Waymo’s business plans. I understand that this confidential business
20 information is maintained by Waymo as secret. The public disclosure of this information would give
21 Waymo’s competitors access to in-depth insight into Waymo’s business strategy for its autonomous
22 vehicle system. If such information were made public, I understand that Waymo’s competitive
23 standing would be significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of the Gonzalez
25 Declaration and Exhibit 8 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on September 22, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.
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12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven
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